

IN THE UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
EASTERN DIVISION

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 4:22CR00146 HEA
)	
JUAN THOMPSON,)	
)	
Defendant.)	

MOTION FOR PREHEARING DETENTION AND HEARING

Comes now the United States of America, by and through its attorneys, Sayler A. Fleming, United States Attorney for the Eastern District of Missouri, and Tracy L. Berry, Assistant United States Attorney for said District, and moves the Court to order defendant detained pending a revocation hearing, and further requests that a detention hearing be held ten (10) days from the date of defendant's initial appearance before the United States Magistrate pursuant to Title 18, United States Code, Section 3142(d) and Federal Rule of Criminal Procedure 32.1.

As and for its grounds, the Government states as follows:

1. Defendant has failed to comply with the instructions of his probation officer and the requirements of his release, and revocation of his supervised release has been requested.
2. There is a serious risk that the defendant will flee because he has evaded the supervision of his officer between June 23, 2022, and July 13, 2022 by making false claims of being hospitalized and by not attending court mandated counseling.
4. There are no conditions or combination of conditions which will reasonably assure the appearance of the defendant as required, and the safety of any other person and the community.

5. Pursuant to Federal Rule of Criminal Procedure 32.1(a)(6), the burden of establishing by clear and convincing evidence that the defendant will not flee or pose a danger to any other person or the community rests with the defendant.

WHEREFORE, the Government requests this Court to order defendant detained prior to a revocation hearing, and further to order a detention hearing ten (10) days from the date of defendant's initial appearance.

Respectfully submitted,

SAYLER A. FLEMING
United States Attorney

s/ Tracy Lynn Berry
TRACY LYNN BERRY #014753 TN
Assistant United States Attorney
111 South 10th Street, Room 20.333
St. Louis, Missouri 63102
(314) 539-2200